

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

**IN RE: American Medical Systems, Inc. MDL NO. 2325
Pelvic Repair System Products Liability
Litigation**

**IN RE: Boston Scientific Corp. Pelvic MDL NO. 2326
Repair System Products Liability Litigation**

**IN RE: Ethicon, Inc., Pelvic Repair System MDL NO. 2327
Products Liability Litigation**

This Document Related to All Cases

**APPLICATION OF JOSEPH H. SAUNDERS FOR APPOINTMENT
TO THE PLAINTIFFS' STEERING COMMITTEE**

This Application is submitted in support of the appointment of Joseph H. Saunders, of Saunders & Walker, P.A. to the Plaintiffs' Steering Committee ("PSC") in the MDL proceedings and, in support thereof, I state:

I am the founder of Saunders & Walker, P.A. in Pinellas Park, Florida. I have been licensed to practice law in the State of Florida since 1982 and licensed to practice law in the State of California since 1981. I am also licensed to practice law in the United States District Court for the Middle District of Florida and in the United States District Court for the Central District of California. I am a Board Certified Civil Trial Lawyer by the Florida Bar and by the National Board of Trial Advocacy. I am AV rated by Martindale-Hubbell.

I was an author of a March, 2012 peer-reviewed article in the American Association for Justice (AAJ) Trial Magazine on *Daubert* Qualification of Regulatory Expert Witnesses in Pharmaceutical and Medical Device Cases.

I am currently a member of the Plaintiffs' Steering Committee in MDL 2096, *In Re: Zicam Cold Remedy Marketing, Sale Practices, and Products Liability Litigation*, in the District of Arizona. In that MDL, my role was to retain and defend the scientific and regulatory expert witnesses, including but not limited to, conducting depositions of both plaintiffs' and defendants' experts. That litigation was concluded in 2011 with a settlement of most cases and remand of the few remaining cases.

I am also currently a member of the Plaintiffs' Steering Committee in the New York State Court's *In re: New York Renu with Moistureloc Product Liability Litigation*, Index No. 766,000/07. The work of that Committee is essentially concluded.

Since 1999, I have handled numerous medical device and pharmaceutical cases, and have served my clients in MDL 1203, *In re: Diet Drugs Product Liability Litigation*; MDL 1410, *In re: Sulzer Hip Prosthesis Product Liability Litigation*; MDL 1431, *In re: Baycol Product Liability Litigation*; MDL 1438, *In re: Rezulin Products Liability Litigation*; MDL 1596 *In re: Zyprexa Product Liability Litigation*; MDL 1657, *In re: Vioxx Products Liability Litigation*; MDL 1726, *In re: Medtronic, Inc., Implantable Defibrillators Products Liability Litigation*; MDL 1785, *In re: Bausch & Lomb Contract Lens Solution Products Liability Litigation*; MDL 1905, *In re: Metronic, Inc., Sprint Fidelis Leads Products Liability Litigation*; MDL 2047, *In re: Chinese Drywall*; MDL 2158, *Zimmer Durom Hip Cup Products Liability Litigation*; and MDL 2197, *In re: DePuy ASR Hip Implant Products Liability Litigation*.

I am currently counsel of record in *Patricia Ann Kelly v. C. R. Bard, Inc.*, Case No. 2:12-cv-00249, Southern District of West Virginia and am co-counsel of record in *Dahlke v. Boston Scientific*, 2:12-cv-00461; *Lehman v. Ethicon, Inc., et al.*, Case No. 2:12-cv-00517; and *Moore v.*

Endo Pharmaceuticals, et al., Case No. 2:12-cv-00732, and have contracts with 30 other clients in, as yet unfiled pelvic mesh cases.

I am personally committed to devoting substantial time and resources to this matter and do not foresee any conflicts or strain on my firm's resources if I am chosen to serve on this Committee.

Throughout the years, I have demonstrated an outstanding ability to work cooperatively with judges and other counsel in all of my individual cases and in mass litigation cases, including with many attorneys who are participating in this MDL.

Respectfully Submitted,

/s/ Joseph H. Saunders
Joseph H. Saunders
SAUNDERS & WALKER, P.A.
3491 Gandy Blvd. North, Ste. 200
Pinellas Park, FL 33781
(727) 579-4500, FAX (727) 577-9696
joe@saunderslawyers.com

CERTIFICATE OF SERVICE

I CERTIFY that I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing of this document on this 30th day of March, 2012.

/s/ Joseph H. Saunders
Joseph H. Saunders